

IN THE DRAWINGS:

The attached Replacement Sheets 1 through 8 include formal drawings for Figures 1 through 7 that were previously submitted on May 20, 2003. Accordingly, Figures 6 and 7 have already been submitted that conform to 37 C.F.R. §1.84. No changes have been made to Figures 6 and 7 or any of the other Figures. The Applicants submit Replacement Sheets 1 through 8 to insure the Examiner has all the formal Figures.

Attachment: Replacement Sheets 1 through 8

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-24 in the application. Previously, the Applicants amended Claims 1-9, 17 and 23. In the present response, the Applicants have not amended, canceled or added any other claims. Accordingly, Claims 1-24 are currently pending in the application.

The Examiner indicated that Claim 23 includes allowable subject matter. As indicated by the below arguments, the Applicants believe that all of the pending Claims are allowable.

I. Formal Matters and Objections

The Examiner has objected to the drawings asserting that Figures 6 and 7 contain handwritten material and are too small to easily read. In response, the Applicants have resubmitted formal drawings for Figures 1 through 7 on the attached Replacement Sheets 1 through 8. These formal drawings that conform to 37 C.F.R. §1.84 include Figures 6 and 7 that were submitted originally on May 20, 2003. Accordingly, the Applicants respectfully request the Examiner to withdraw the objection to the drawings.

II. Rejection of Claims 1, 9 and 17 under 35 U.S.C. §102

The Examiner rejected Claims 1, 9 and 17 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,633,882 to Fayyad, *et al.* The Applicants respectfully disagree since Fayyad does not teach discovering at least one model of data mining models with guaranteed error bounds of at

least one attribute in a data table in terms of other attributes in different columns of the data table as recited in independent Claims 1, 9 and 17.

Fayyad discloses employing a data mining engine to produce a clustering model derived from a database. (See column 5, lines 20.) Accuracy parameters are used to control the clustering initialization process. (See column 9, lines 64-65.) The accuracy parameters, however, are not guaranteed error bounds of an attribute of the database **in terms of other attributes** in different columns of the database. Instead, Fayyad teaches the accuracy parameters are adjustable parameters used to determine, for example, the number of data points per attribute partition or the probability of a partition satisfying an accuracy criterion. (See column 9, line 65 to column 10, line 11.) As such, the Applicants do not find any teaching in Fayyad indicating that the accuracy parameters are in terms of other attributes in different columns, but find that the accuracy parameters are adjustable values used to control the make-up of the attribute partitions. Thus, the accuracy parameters of Fayyad do not disclose guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in independent Claims 1, 9 and 17.

Since Fayyad does not teach each element of amended independent Claims 1, 9 and 17, Fayyad does not anticipate Claims 1, 9 and 17. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1, 9 and 17 and allow issuance thereof.

III. Rejection of Claims 2-8, 10-16, 18-22 and 24 under 35 U.S.C. §103

The Examiner rejected Claims 2-8, 10-16, 18-22 and 24 under 35 U.S.C. §103(a) as being unpatentable over Fayyad in view of U.S. Patent No. 5,799,311 to Agrawal, *et al.*, ("Agrawal 311") for Claims 2, 4-5, 7-8, 10, 12-13, 16, 18, 20-21 and 24; U.S. Patent No. 6,810,368 to Pednault for Claims 2-3, 10-11 and 18-19; U.S. Patent No. 6,189,005 to Chakrabarti, *et al.*, for Claims 6, 14 and 22; and U.S. Patent No. 6,651,048 to Agrawal, *et al.* ("Agrawal 048") for Claim 15. The Applicants respectfully disagree.

As discussed above, Fayyad does not teach discovering at least one model of data mining models with guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in independent Claims 1, 9 and 17. Additionally, Fayyad does not suggest discovering at least one model of data mining models with guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in independent Claims 1, 9 and 17. Instead, Fayyad teaches clustering data points under the control of accuracy parameters that are not in terms of other attributes in different columns of a data table but instead are justified values to control the number of data points in a partition. (See column 9, line 64 to column 10, line 27.) Agrawal 311, Pednault, Chakrabarti and Agrawal 048 were not cited to cure the above deficiency of Fayyad but to teach the subject matter of the dependent claims identified above. Accordingly, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not provide a *prima facie* case of obviousness of independent Claims 1, 9 and 17 and Claims dependent thereon. Thus, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not

render obvious Claims 2-8, 10-16 and 18-24. The Applicants, therefore, respectfully request the Examiner withdraw the under §103(a) rejection of Claims 2-8, 10-16, 18-22 and 24 and allow issuance thereof.

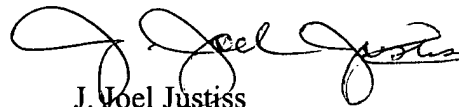
IV. Conclusion

In view of the foregoing remarks, the Applicants see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-24.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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